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May 2, 2018

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Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
United States Courthouse  
100 Federal Plaza  
Central Islip, New York

BY ECF

Re: United States v. Kenner & Constantine  
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine ("Constantine") and *Pro Se* co-defendant Philip Kenner ("Kenner") respectfully submit this joint letter for an extension of the due date of their oppositions to the government's Forfeiture Motion to approximately forty-five days from today. Last week, the Court granted Constantine's Motion for Appointment of a Forensic Accountant. During the pendency of that motion, I met with Kenner for the purpose of coordinating our Oppositions and he expressed a desire to also move for appointment of forensic accountant. We discussed the matter and agreed that one forensic accountant would suffice for both defendants, streamline the process and save resources. I have been in contact with the Circuit CJA Coordinator regarding the credentials and costs of a forensic accountant and expect authorization to retain that individual in the next few days. Once the approval is received, an application for appointment will be file on the E-Voucher system forthwith.

The filing deadline extension will provide the forensic expert with time to conduct his examination and for the defendants to use that information in their Oppositions. The government, by Assistant United States Attorney Madeline O'Conner, consents to this application

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*

Sanford Talkin

cc: AUSA Diane Leonardo (by ECF)  
AUSA Madeline O'Connor (by ECF)  
AUSA Saritha Komatireddy (by ECF)  
AUSA Matthew Haggans (by ECF)  
Philip Kenner (by mail)